

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

PEGASYSTEMS INC.,

Plaintiff/Counterclaim Defendant,

v.

APPIAN CORPORATION,

Defendant/Counterclaim Plaintiff,

and

BUSINESS PROCESS MANAGEMENT, INC.,

Defendant.

Case No. 19-cv-11461

**DECLARATION OF ADEEL A. MANGI IN SUPPORT OF
APPIAN CORPORATION'S UNOPPOSED MOTION TO FILE UNDER SEAL
CERTAIN DOCUMENTS SUBMITTED IN SUPPORT OF ITS MOTION FOR
PERMISSION TO INTERVIEW JOHN PETRONIO**

I, Adeel A. Mangi, declare as follows:

1. I am a member in good standing of the bar of the State of New York and am admitted in this action *pro hac vice*. I am a member of Patterson Belknap Webb & Tyler LLP, counsel for Defendant Appian Corporation ("Appian") in this action. I submit this declaration in support of Appian's unopposed motion to file under seal certain documents submitted in support of Appian's motion for permission to interview John Petronio.

2. Each of these documents contains information that Pegasystems has designated as "Confidential" under the Protective Order (ECF 99) governing confidential information in this case. Exhibits 2-5 of the Declaration of Adeel A. Mangi contain information identifying individuals who accessed the Pegasystems' webpage that hosted the Sinur Report.

Exhibit 6 contains information regarding (a) the identities of Pegasystems' customers and (b) the payment terms under the service contract between Pegasystems and Mr. Sinur. Exhibits 19-20 are Pegasystems' employment and separation agreements with Mr. Petronio. The Exhibits 17-18 and 21-24, as well the Memorandum of Law filed in support of Appian's Motion, contain excerpts from Mr. Petronio's agreements or otherwise disclose the substance of those agreements.

3. Appian's counsel contacted Pegasystems' counsel prior to this filing to ask if Pegasystems wished to maintain its designations over these materials, which would require them to be filed under seal. Pegasystems' counsel confirmed that it wished to maintain the designations.

4. Appian takes no position regarding the propriety of Pegasystems' designation of this information as Confidential.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
November 6, 2020

/s/ Adeel A. Mangi
Adeel A. Mangi

CERTIFICATE OF SERVICE

I, Adeel A. Mangi, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Adeel A. Mangi
Adeel A. Mangi